

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a  
LATASHA TRANSRINA HOWARD and  
STARMARIE EBONY JONES,

Defendants.

Case No. 1-19-cv-01301-WMR

**CONSENT MOTION FOR EXTENSION OF TIME**

Defendant Latasha Transrina Kebe (“Ms. Kebe”) respectfully submits this Consent Motion for Extension of Time to respond to Plaintiff’s Motion to Compel Production of Documents, and provides as follows:

1. On December 22, 2020, the parties agreed that each would have twenty-five (25) days, instead of fourteen (14), to respond to motions to compel filed by opposing counsel.
2. On December 31, 2020, Plaintiff filed a motion to compel production of documents. (Dkt. Nos. 96 and 97).
3. The current deadline to respond is Thursday, January 14, 2021.
4. The Court has scheduled a hearing on this, and other, pending motions

for Wednesday, February 3, 2021.

5. In light of the parties' mutual agreement and the fact that the requested extension will not delay the hearing and resolution of this motion, Ms. Kebe respectfully requests an extension of the response deadline to Monday, January 25, 2021.
6. Counsel for Plaintiff has consented to the requested extension.
7. A proposed order has been submitted with this motion.

**CERTIFICATION AS TO FONT**

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14, a font and point selection approved by the Court in Local Rule 5.1(C).

Respectfully submitted this 13th day of January, 2021.

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*Attorneys for Latasha Kebe*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 13, 2021, I electronically filed the foregoing  
CONSENT MOTION FOR EXTENSION OF TIME with the Clerk of the Court  
using the CM/ECF system, which will automatically send email notification of such  
filing to all of the attorneys of record.

/s/Olga Izmaylova  
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